

1 Jonathan W. Fountain, Esq.
 2 Nevada Bar No. 10351
 3 John J. Savage, Esq.
 4 Nevada Bar No. 11455
 HOWARD & HOWARD ATTORNEYS PLLC
 3800 Howard Hughes Pkwy., Suite 1000
 Las Vegas, NV 89169
 Tel. (702) 257-1483
 Email: jwf@h2law.com
 Email: jjs@h2law.com

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 6 *Attorneys for Plaintiff/Counterdefendant*
 7 *Volunteer Crossing, LLC*

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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 VOLUNTEER CROSSING, LLC, a Nevada
 limited liability company,

12 Plaintiff,
 13 vs.

14 COUNTY OF CLARK, a political subdivision
 of the State of Nevada; DOES 1 through 10,
 15 inclusive; ROE ENTITIES 1 through 10,
 inclusive

16 Defendants.
 17 and

18 32 ACRES, LLC, a Nevada limited liability
 company,

19 Nominal Defendant.

20 Case No. 2:24-cv-01433-APG-DJA

21 **STIPULATION AND [PROPOSED]
 22 ORDER FOR EXTENSION OF CASE
 23 MANAGEMENT DEADLINES**

24 **(First Request)**

1 Pursuant to Federal Rule of Civil Procedure 16(b)(4), LR IA 6-1, and LR 26-3, Plaintiff
2 Volunteer Crossing, LLC (“Volunteer”), Defendant Clark County (“Clark County”), and Nominal
3 Defendant 32 Acres, LLC (“32 Acres”) hereby agree and stipulate, and respectfully seek the
4 Court’s permission, to extend the case management deadlines set forth in the Court’s Scheduling
5 Order (ECF No. 28). This is the parties’ first requested extension of case management deadlines.
6 In support of their stipulation and request, the parties state as follows:

7 **I. The Discovery Completed to Date – LR 26-3(a)**

8 The parties have completed the following discovery: the parties have each served initial
9 Rule 26(a)(1)(A) disclosures. The parties have not engaged in any other discovery.

10 **II. The Discovery that Remains to be Completed – LR 26-3(b)**

11 The following discovery remains to be completed: the parties anticipate serving written
12 discovery request on each other party in this matter including interrogatories, requests for the
13 production of documents, and requests for admissions. The parties also anticipate serving third-
14 party subpoenas to obtain documents and testimony from third parties and conducting depositions
15 of party and non-party witnesses.

16 **III. The Reasons Why Prior Deadlines Were Not Met or Cannot be Met – LR 26-3(c)**

17 The parties seek an extension of the case management deadlines for the following reasons.
18 First, Volunteer and Clark County entered a stipulation whereby Volunteer agreed not to
19 immediately re-file its preliminary injunction motion that was pending when this case was
20 removed to this Court, and Clark County agreed to maintain the status quo stay for a period of 90
21 days so that Clark County could bring 32 Acres into this case and so that the parties could engage
22 in settlement discussions. That ninety-day period expired without the parties reaching an
23 agreement to settle the case, but the parties continued to engage in informal discussions aimed at
24 reaching a settlement. However, shortly after the Christmas and New Years’ holidays,
25 Volunteer’s principal counsel and lead counsel in this matter, Thomas W. Davis, II, Esq., passed
26 away on January 2, 2025. While the parties have since had additional settlement discussions, it
27 appears that the parties’ settlement discussions are now at an impasse and the parties are ready to
28 proceed with discovery in this case. The parties agree that the foregoing circumstances constitute

1 good cause for the requested extension of case management deadlines.

2 **IV. A Proposed Schedule for Completing All Remaining Discovery – LR 26-3(d)**

3 The parties jointly propose the following schedule for completing remaining discovery:

4 Event	5 Current Deadline	6 Proposed Deadline
7 Initial Expert Disclosures	8 February 13, 2025	9 June 13, 2025
10 Rebuttal Expert Disclosures	11 March 15, 2025	12 July 13, 2025
13 Discovery Cutoff	14 April 14, 2025	15 August 12, 2025
16 Dispositive Motions	17 May 14, 2025	18 September 11, 2025
19 Joint Pretrial Order	20 June 13, 2025 (unless one or more dispositive motions have been filed, in which case the date for filing the Joint Pretrial Order shall be thirty (30) days after entry of the Court's order resolving the last pending dispositive motion)	21 October 11, 2025 (unless one or more dispositive motions have been filed, in which case the date for filing the Joint Pretrial Order shall be thirty (30) days after entry of the Court's order resolving the last pending dispositive motion)

22 This is the parties' first request to extend the case management deadlines. The parties
23 make this stipulation in good faith, to promote the just, speedy, and inexpensive determination of
24 this action, and not for purposes of undue delay.

25 **IT IS SO AGREED AND STIPULATED:**

26 OLSON CANNON & GORMLEY

27 By: /s/ Thomas D. Dillard
28 Thomas D. Dillard, Jr., Esq.
Nevada Bar no. 6270
9950 W. Cheyenne Avenue
Las Vegas, NV 89129
Tel. (702) 384-4012
Email: tdillard@ocgattorneys.com

29 *Attorneys for Defendant, Counterclaimant, and
30 Third-Party Plaintiff Clark County, Nevada*

31 Womble Bond Dickinson LLP

32 By: /s/ Ogonna M. Brown
33 Ogonna M. Brown, Esq.
Nevada Bar No. 789
Trent L. Earl, Esq.
Nevada Bar No. 15214
3993 Howard Hughes, Pkwy., Suite 600
Las Vegas, NV 89169
Telephone: (702) 949-8200
Email: Ogonna.brown@wbd-us.com
Email: Trent.earl@wbd.-us.com

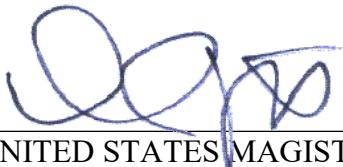
33 *Attorneys for Third-Party Defendant 32
34 Acres, LLC*

1 HOWARD & HOWARD ATTORNEYS PLLC
2

3 By: /s/ Jonathan W. Fountain
4 Jonathan W. Fountain, Esq.
5 Nevada Bar No. 10351
6 John J. Savage, Esq.
7 Nevada Bar No. 11455
8 3800 Howard Hughes Pkwy., Suite 1000
9 Las Vegas, NV 89169
10 Telephone: (702) 257-1483
11 Email: jwf@h2law.com
12 Email: jj@h2law.com

13 *Attorneys for Plaintiff and Counter-defendant
14 Volunteer Crossing, LLC*

15 **IT IS SO ORDERED:**

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18 UNITED STATES MAGISTRATE JUDGE
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20 DATED: 2/19/2025
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